

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE:  
PIONEER HEALTH SERVICES, INC.  
Debtor**

**CHAPTER 11  
CASE NO. 16-01119-NPO**

**IN RE:  
PIONEER HEALTH SERVICES  
OF EARLY COUNTY, LLC  
Debtor**

**CHAPTER 11  
CASE NO. 16-01243-NPO**

**MOTION FOR ADMINISTRATIVE CONSOLIDATION**

COME NOW Pioneer Health Services, Inc. and Pioneer Health Services of Early County, LLC (“Movants”), and file this their Motion for Administrative Consolidation (the “Motion”), and in support thereof, would respectfully show as follows, to-wit:

1. Pioneer Health Services of Early County, LLC, filed a Petition for relief under Chapter 11 in the above styled and numbered case, on April 8, 2016.
2. This Honorable Court has jurisdiction of the subject matter herein and the parties hereto pursuant to 28 U.S.C. §§ 157 and 1334; 11 U.S.C. §§ 105, 363, 541, 1107, related statutes, related rules and various orders of reference. This is a core proceeding.
3. Prior to the filing of the bankruptcy case of Pioneer Health Services of Early County, LLC today, its parent company of Pioneer Health Services, Inc., as well as several other affiliated companies, filed for bankruptcy under Chapter 11 on March 30, 2016. Subsequent to the filing of a Motion for Administrative Consolidation of each of those cases, all of the affiliated cases, with the exception of Medicomp, Inc., were administratively consolidated into the bankruptcy case of the

parent company of Pioneer Health Services, Inc., Case No. 16-01119, by the Court's Order dated April 6, 2016 [DK #44], a copy of which is attached hereto as Exhibit "A" and incorporated herein by reference. Pioneer Health Services, Inc. will hereinafter be referred to as the "Lead Case".

4. There are sufficient common areas of administration in the bankruptcy case of Pioneer Health Services of Early County, LLC, which justify the Court entering an order consolidating this case into the Lead Case for administrative purposes.

5. The benefits and efficiencies of joint administration of all of these cases significantly outweigh the administration of this case as a "separate" case that has not been consolidated for administrative purposes.

6. Movants suggest that Pioneer Health Services of Early County, LLC, Case No. 16-01243 should be administratively consolidated with and "into" the Lead Case of Pioneer Health Services, Inc., Case No. 16-01119-NPO.

7. Accordingly, in the event the Court sees fit to grant the Motion, Pioneer Health Services of Early County, LLC (Case No. 16-01243) shall be administratively consolidated with, and into, Pioneer Health Services, Inc. (Case No. 16-01119).

8. Other grounds to be assigned upon a hearing hereof.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully prays that upon a hearing hereof, this Honorable Court will enter its Order granting the Motion. The Debtor prays for general relief.

DATED, this the 8<sup>th</sup> day of April, 2016.

Respectfully submitted,

PIONEER HEALTH SERVICES, INC. and  
PIONEER HEALTH SERVICES OF EARLY, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: /s/ Craig M. Geno  
Craig M. Geno

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Ronald H. McAlpin, Esq.  
[ronald.mcalpin@usdoj.gov](mailto:ronald.mcalpin@usdoj.gov)

THIS, the 8<sup>th</sup> day of April, 2016.

/s/ Craig M. Geno  
Craig M. Geno



SO ORDERED,

A handwritten signature in blue ink, reading "Neil P. Olack".

Judge Neil P. Olack  
United States Bankruptcy Judge  
Date Signed: April 6, 2016

The Order of the Court is set forth below. The docket reflects the date entered.

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: PIONEER HEALTH SERVICES, INC.**  
Debtor

**CHAPTER 11  
CASE NO. 16-01119-NPO**

**IN RE: PIONEER HEALTH SERVICES OF  
CHOCTAW COUNTY, LLC**  
Debtor

**CHAPTER 11  
CASE NO. 16-01123-NPO**

**IN RE: PIONEER HEALTH SERVICES  
OF MONROE COUNTY, INC.**  
Debtor

**CHAPTER 11  
CASE NO. 16-01125-NPO**

**IN RE: PIONEER HEALTH SERVICES  
OF NEWTON COUNTY, LLC**  
Debtor

**CHAPTER 11  
CASE NO. 16-01121-NPO**

**IN RE: PIONEER HEALTH SERVICES  
OF ONEIDA, LLC**  
Debtor

**CHAPTER 11  
CASE NO. 16-01124-NPO**

**IN RE: PIONEER HEALTH SERVICES  
OF PATRICK COUNTY, INC.**  
Debtor

**CHAPTER 11  
CASE NO. 16-01120-NPO**

**IN RE: PIONEER HEALTH SERVICES  
OF STOKES COUNTY, INC.**  
Debtor

**CHAPTER 11  
CASE NO. 16-01122-NPO**



**ORDER GRANTING MOTION FOR  
ADMINISTRATIVE CONSOLIDATION**

THIS CAUSE having come on for hearing on the Motion(s) for Administrative Consolidation (the “Motion”) of Pioneer Health Services, Inc. [DK #19]; the Motion of Pioneer Health Services of Choctaw County, LLC [DK #18]; the Motion of Pioneer Health Services of Monroe County, Inc. [DK #18]; the Motion of Pioneer Health Services of Newton County, LLC [DK #19]; the Motion of Pioneer Health Services of Oneida, LLC [DK #18]; the Motion of Pioneer Health Services of Patrick County, Inc. [DK #19]; and the Motion of Pioneer Health Services of Stokes County, Inc. [DK #18] no objections having been filed thereto, the Court is of the opinion that the Motion(s) should be granted, in part. It is, accordingly,

ORDERED that Debtor Pioneer Health Services, Inc. is the owner of several entities that have also filed Chapter 11 cases: Pioneer Health Services of Patrick County, Inc. (Case No. 16-01120), Pioneer Health Services of Newton County, LLC (Case No. 16-01121), Pioneer Health Services of Stokes County, Inc. (Case No. 16-01122), Pioneer Health Services of Choctaw County, LLC (Case No. 16-01123), Pioneer Health Services of Oneida, LLC (Case No. 16-01124), and Pioneer Health Services of Monroe County, Inc. (Case No. 16-01125) (collectively, the “Affiliates”). Pioneer Health Services, Inc. will hereinafter be referred to as the “Lead Case”. It is, further,

ORDERED There are sufficient common areas of administration in these cases that justify the Court entering an order consolidating the cases for administrative purposes. It is, further

ORDERED The benefits and efficiencies of joint administration of these cases significantly outweigh the administration of these cases as “separate” cases that have not been consolidated for administrative purposes. It is, further,

ORDERED the Lead Case and the Affiliates should be administratively consolidated with and “into” the Lead Case of Pioneer Health Services, Inc., Case No. 16-01119-NPO because, in part, that case was the first filed case of the cases involved in this Motion and because the Debtor in that case owns all of the Affiliates. It is, further

ORDERED the bankruptcy cases of Pioneer Health Services of Patrick County, Inc. (Case No. 16-01120), Pioneer Health Services of Newton County, LLC (Case No. 16-01121), Pioneer Health Services of Stokes County, Inc.(Case No. 16-01122), Pioneer Health Services of Choctaw County, LLC (Case No. 16-01123), Pioneer Health Services of Oneida, LLC (Case No. 16-01124), Pioneer Health Services of Monroe County, Inc.(Case No. 16-01125), shall be administratively consolidated with, and into Pioneer Health Services, Inc. (Case No. 16-01119). It is, further

ORDERED that the case of Medicomp, Inc. (Case No. 16-01126-NPO) shall **NOT** be administratively consolidated but shall remain as a separate case.

**### END OF ORDER ###**

SUBMITTED BY:

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